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8  
9 **IN THE UNITED STATES BANKRUPTCY COURT**  
10 **FOR THE DISTRICT OF ARIZONA**

11 In re

12 PATRICK FRANCIS KEERY and KATHLEEN  
13 LOUISE KEERY,

14 Debtors.

15 Address: 7119 E. Shea Blvd.  
16 Suite 109-271  
17 Scottsdale, AZ 85254

18 Social Security No(s): xxx-xx-7618  
19 xxx-xx-1961

Chapter 11 Proceedings

Case No. 2:10-bk-23584-RJH

**MOTION TO EXTEND PLAN FILING  
DEADLINES**

Current Deadline: October 26, 2010

18 Patrick and Kathleen Keery (the “Debtors”) request the Court pursuant to 11 U.S.C.  
19 §1121(d) to extend the deadline within which the Debtors have to file a Plan an additional sixty (60)  
20 days from October 26, 2010 to December 27, 2010, and to extend the period within which the  
21 Debtors have the exclusive right to solicit acceptances of the Plan an additional sixty (60) days from  
22 January 24, 2011 to March 25, 2011. There is no Unsecured Creditors Committee in this  
23 proceeding. The Debtors believe additional time is warranted.

24 The size and complexity of this bankruptcy reorganization and various extenuating  
25 circumstances justify the extension of the plan filing deadlines. The Debtors filed their petition on  
26 July 28, 2010.

27 There do not appear to be any parties who would be affected detrimentally by the extension  
28 of time. The Debtors are making good faith progress toward filing a Plan. Therefore, it is in the

1 best interest of all creditors to extend the time in which the Debtors have to file a Plan for an  
2 additional 60 days from October 26, 2010 to December 27, 2010, and to extend the period within  
3 which the Debtors have the exclusive right to solicit acceptances of the Plan an additional 60 days  
4 from January 24, 2011 to March 25, 2011.

5 The Debtors have only been in bankruptcy for three months. Their good faith efforts in  
6 progressing toward a successful reorganization are evident. Finally, they are working diligently to  
7 secure a means by which to reorganize. The Debtors firmly believe they are in the best position to  
8 create and negotiate the best possible Plan for creditors.

9 WHEREFORE, the Debtors pray that this Court enter an order extending the deadline that  
10 the Debtors have to file a Plan for an additional 60 days from October 26, 2010 to December 27,  
11 2010, and to extend the period within which the Debtors have the exclusive right to solicit  
12 acceptances of the Plan an additional 60 days from January 24, 2011 to March 25, 2011, and  
13 granting such other relief as this Court may deem proper.

14 DATED this \_\_\_\_ day of October, 2010.

15 AIKEN SCHENK HAWKINS & RICCIARDI P.C.

16  
17 By 

18 D. Lamar Hawkins  
19 Philip R. Rupprecht  
20 Christopher R. Chicoine  
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22 Phoenix, Arizona 85016-4859  
23 Attorneys for Debtors

24 COPY of the foregoing mailed, or served  
25 via electronic notification\* or fax\*\* or if so marked,  
26 this 25 day of October, 2010 to:

27 U.S. TRUSTEE'S OFFICE  
28 230 N. First Ave., Ste. 204  
Phoenix, AZ 85003-1706

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